

Lisa A. McClane  
Nevada State Bar No. 10139  
Daniel Aquino  
Nevada State Bar No. 12682  
**JACKSON LEWIS P.C.**  
300 S. Fourth Street, Suite 900  
Las Vegas, Nevada 89101  
Tel: (702) 921-2460  
Fax: (702) 921-2461  
Email: [lisa.mcclane@jacksonlewis.com](mailto:lisa.mcclane@jacksonlewis.com)  
Email: [daniel.aquino@jacksonlewis.com](mailto:daniel.aquino@jacksonlewis.com)

7 Attorneys for Defendant  
*WESTERN STATES CONTRACTIC, INC.*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

11 JAY COLLINS,  
12 Plaintiff,  
13 vs.  
14 WESTERN STATES CONTRACTING, INC, a  
15 Nevada corporation; AND DOES 1-50,  
inclusive,  
16 Defendant.

Case No.: 2:20-cv-00302-JAD-NJK

**STIPULATION TO EXTEND EARLY  
NEUTRAL EVALUATION BRIEFING**

18 IT IS HEREBY STIPULATED by and between Plaintiff JAY COLLINS (“Plaintiff”),  
19 through his counsel, Watkins & Letofsky, LLP, Defendant, WESTERN STATES  
20 CONTRACTING, (“Defendant” or “Western”), by and through its counsel, Jackson Lewis P.C.,  
21 hereby stipulate and agree as follows:

22       1. On May 06, 2020, the Court entered an Order scheduling this matter for an Early  
23 Neutral Evaluation (hereinafter referred to as “ENE”) hearing on June 16, 2020 at 9:30 a.m.  
24 before the Honorable Brenda Weksler, United States Magistrate Judge. ECF No. 12.

25       2. The Court further ordered that written evaluation statements shall be received by  
26 the Court no later than June 8, 2020.

27       3. The parties agree and respectfully request that, due to an unanticipated health  
28 emergency relating to a member of Defendant's counsel's family, and office closures relating to

1 Covid-19 pandemic, the Court grant an extension of the deadline of its Early Neutral Evaluation  
2 briefing and Early Neutral Evaluation session for sixty (60) days.

3       4. This stipulation and order are sought in good faith and not for the purpose of delay.

4       5. This is the first request for an extension of the deadline of the Court's ENE  
5 briefing and written evaluation statements.

6       6. Nothing in this Stipulation, nor the fact of entering to the same, shall be construed  
7 as waiving any claim and/or defense held by any party.

8              Dated this 8<sup>th</sup> day of June, 2020.

9              WATKINS & LETOFSKY, LLP

JACKSON LEWIS P.C.

10             \_\_\_\_\_  
11             /s/ Theresa M. Santos

Daniel R. Watkins  
DW@wl-llp.com  
Theresa M. Santos  
tsantos@wl-llp.com  
8215 S. Eastern Ave., Ste. 265  
Las Vegas, NV 89123  
Office:(702) 901-7553  
Fax: (702) 974-1297

15             Attorney for Plaintiff  
16             JAY COLLINS

17             IT IS ORDERED that ECF No. 15  
18             is GRANTED.

19             IT IS FURTHER ORDERED that  
20             the ENE in this case is rescheduled  
21             to August 21, 2020. The pre-ENE  
22             call is rescheduled to August 20,  
23             2020 at 3:00 p.m. The parties ENE  
24             statements are due on August 13,  
25             2020 by 5:00 p.m.

26             4815-5910-0605, v. 1

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/s/ Lisa A. McClane

Lisa A. McClane, Bar No. 10139  
Daniel Aquino, Bar No. 12682  
300 S. Fourth Street, Suite 900  
Las Vegas, Nevada 89101

Attorneys for Defendant  
WESTERN STATES CONTRACTING, INC.

ORDER

**IT IS SO ORDERED.**



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United States District Court / Magistrate Judge

Dated: 6/9/2020